COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own
Motion into the Appropriate Pricing, based upon Total Element Long-Run
Incremental Costs, for Unbundled Network Elements and Combinations of
Unbundled Network Elements, and the Appropriate Avoided Cost Discount for   D.T.E.
Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the   01-20
Commonwealth of Massachusetts

AT&T's THIRTEENTH SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc. hereby submits the following information
requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the
name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if
Verizon subsequently receives or becomes aware of additional information responsive to
these requests.

If an answer refers to Verizon's response to another information request in this
proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why
Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the
privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate
operations.

The references in the following questions are to the hard copy of the Non-Recurring Cost Model that was distributed by Verizon on May 8, 2001.

ATT-VZ 13-1. For each UNE for which Verizon seeks to set NRC rates in this docket, please indicate whether or not that UNE can presently be ordered electronically by CLECs.

For each UNE for which electronic ordering is not available today, please indicate if the forward looking adjustment in the Verizon NRCM assumes electronic ordering in the future.

For each UNE for which electronic ordering is not available today and for which electronic ordering is not considered in the forward looking adjustment, please fully explain why.

Where the cost of modifying systems to allow electronic ordering is part of any explanation provided in response to the previous question, please provide any and all estimates, quotes from consultants or vendors, and/or opinions from Verizon employees regarding the actual or estimated cost of the modifications necessary to allow electronic ordering.

ATT-VZ 13-2. Provide the requested information concerning Verizon NRCM TISOC Task #1.

Is Task #1 made necessary only by CLEC-caused errors? If there are circumstances in which Task #1 is necessary for any reason other than CLEC-caused error, please list all such reasons.

Please provide some examples of actual orders that have been submitted to Verizon electronically and that also required Task #1. If no actual orders requiring Task #1 are available, please list and describe in detail all of the types of problems that would be encountered by Verizon and which would require Task #1.

Wherever a forward-looking adjustment is applied to Task #1, explain how that adjustment was calculated and provide all documents substantiating that calculation. Please specify all instances in which the forward-looking adjustment to Task #1 was based only on the opinion of experts and no additional information is available.

How does Verizon's OSS determine that an LSR needs manual assistance?

Provide any and all rules residing in the OSS that would cause an LSR to be manually printed in the TISOC.

For every element in the Verizon NRCM which lists Task #1 as taking 50 minutes to complete:

State the number of minutes which are spent manually typing into Verizon's OSS.

State the number of minutes it currently takes to:

a. receive the order

b. Print the order

c. Review the order

d. Type and confirm the order request

For every element in the Verizon NRCM which lists Task #1 as taking 160 minutes to complete:

State the number of minutes which are spent manually typing into Verizon's OSS?

State the number of minutes it currently takes to:

a. receive the order

b. Print the order

c. Review the order

d. Type and confirm the order request

Please provide copies of any documents created or provided by Anderson Consulting in connection with its evaluation of Telecom Industry Services Operations Center activities.

Using the worksheet "Conn Time" (CONNECT - AVERAGE WORK TIME (Minutes), please explain why the cells corresponding to TISOC Tasks #1-4 for "2W Hotcut Init," "IDLC to Copper Hotcut Init," "4W New Init," and "4W Hotcut Init" all indicate that the source of their data is worksheet #1 "2W New Init."

Using the worksheet "Conn Time" (CONNECT - AVERAGE WORK TIME (Minutes)). For each element where non-grayed blank cells exist, and no value is listed for TISOC Tasks #1-4, please provide the reference cell used for that element and the reason why there is no value shown on this worksheet. One example of a non-greyed blank cell is cell E5, corresponding to "2W Hotcut Init."

If LSRs have errors caused by a CLEC, what steps are taken to train or instruct the CLEC to prevent reoccurrence of the error?

i) How is this information communicated to the CLEC?

ii) Please provide all communications such as correspondence or training guides that Verizon may have given to any CLEC to aid the CLEC in preventing errors from reoccurring.

ATT-VZ 13-3. Please explain why the Verizon NRCM applies TISOC Task #1 to hotcut orders instead of applying TISOC Task #2.

ATT-VZ 13-4. Please explain why the Verizon NRCM applies TISOC Task #2 to a "Two Wire Analog-Dig UNE-P New Initial?"

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its attorneys,

_____

Jeffrey F. Jones

Kenneth W. Salinger

Jay E. Gruber

Emily R. Donovan

Kevin R. Prendergast

Palmer & Dodge LLP

One Beacon Street

Boston, MA 02118

(617) 573-0100

May 31, 2001